

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA ex rel.;  
CORI RIGSBY; AND KERRI RIGSBY

RELATORS/COUNTER-DEFENDANTS

v.

CASE No. 1:06-cv-433-LTS-RHW

STATE FARM FIRE & CASUALTY  
COMPANY, et al.

DEFENDANTS/COUNTER-PLAINTIFFS

**RELATORS' MOTION TO COMPEL  
COMPLETE AND PROMPT PRODUCTION OF LATE-DISCLOSED DOCUMENTS**

Cori and Kerri Rigsby ("Relators") hereby respectfully move this Court for an order compelling Defendant State Farm Fire & Casualty Company ("State Farm") to produce in their entirety the late-disclosed documents first identified to Relators in a supplemental privilege log on January 14, 2011 (the "Documents"). A verified good faith certificate is attached to this motion. Relators would show:

1. State Farm has, by its untimely disclosure and inadequate description of 8,000 pages of allegedly privileged materials, waived any privilege attached to the Documents;
2. State Farm has, in spite of repeated verbal and written requests to explain the circumstances surrounding the discovery of these Documents and their disclosure to Relators, refused to give an adequate explanation for its failure to disclose these Documents prior to the parties' hearing before the Court on January 12, 2011; and
3. State Farm has given multiple, contradictory characterizations of the nature of these Documents, from completely privileged to mostly non-responsive, that do not square with either the first supplemental privilege log or its latest supplemental privilege log, provided to Relators on February 11, 2011.

WHEREFORE, Relators ask this Court to enter an order compelling the immediate and complete production of all documents referenced on its supplemental privilege logs of January 14, 2011 and such other relief as is just.

Respectfully submitted this the 18th day of February, 2011.

/s/ C. Maison Heidelberg  
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**CERTIFICATE OF SERVICE**

I, C. Maison Heidelberg, attorney for Cori Rigsby and Kerri Rigsby, do hereby certify that I have this **18th day of February, 2011** caused the foregoing document to be filed with the Court's CM/ECF system, which will cause notice to be delivered to all counsel of record.

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